

**BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

LAURA LEE OLLIS, AKA LAURA OLLIS,
AKA LEE SUSAN KNIGHT, AKA LORA LEE
OLLIS
14581 May Lane
Moreno Valley, CA 92553

Registered Nurse License No. 436840

Respondent.

Case No. 2008-185

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on October 16, 2008.

It is so ORDERED October 16, 2008.

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FOR THE BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS

1 EDMUND G. BROWN JR., Attorney General
of the State of California

2 LINDA K. SCHNEIDER
Supervising Deputy Attorney General

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8 Attorneys for Complainant

9 **BEFORE THE**
10 **BOARD OF REGISTERED NURSING**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No. 2008-185

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LEE SUSAN KNIGHT, aka
16 LORA LEE OLLIS
14581 May Lane
Moreno Valley, CA 92553

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

17 Registered Nurse License No. 436840

Respondent.

18
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
20 proceeding that the following matters are true:

21 **PARTIES**

22 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) is the Executive Officer of
23 the Board of Registered Nursing. She brought this action solely in her official capacity and is
24 represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California,
25 by Rita M. Lane, Deputy Attorney General.

26 2. Laura Lee Ollis, aka Laura Ollis, aka Lee Susan Knight, aka Lora Lee
27 Ollis (Respondent) is representing herself in this proceeding and has chosen not to exercise her
28 right to be represented by counsel.

3. On or about March 31, 1989, the Board of Registered Nursing issued Registered Nurse License No. 436840 to Respondent. The license expired on October 31, 2006, and has not been renewed.

JURISDICTION

4. Accusation No. 2008-185 was filed before the Board of Registered Nursing (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on December 24, 2007. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 2008-185 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Accusation No. 2008-185. Respondent also has carefully read, and understands the effects of this Stipulated Surrender of License and Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 2008-185, agrees that cause exists for discipline and hereby surrenders her Registered Nurse License No. 436840 for the Board's formal acceptance.

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9. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Registered Nurse without further process.

CONTINGENCY

10. This stipulation shall be subject to approval by the Board of Registered Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Registered Nursing may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 436840, issued to Respondent Laura Lee Ollis, aka Laura Ollis, aka Lee Susan Knight, aka Lora Lee Ollis is surrendered and accepted by the Board of Registered Nursing.

13. The surrender of Respondent's Registered Nurse License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.

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1 14. Respondent shall lose all rights and privileges as a registered nurse in
2 California as of the effective date of the Board's Decision and Order.

3 15. Respondent shall cause to be delivered to the Board both her pocket
4 license and wall certificate on or before the effective date of the Decision and Order.

5 16. Respondent fully understands and agrees that if she ever files an
6 application for licensure or a petition for reinstatement in the State of California, the Board shall
7 treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations
8 and procedures for reinstatement of a revoked license in effect at the time the petition is filed,
9 and all of the charges and allegations contained in Accusation No. 2008-185 shall be deemed to
10 be true, correct and admitted by Respondent when the Board determines whether to grant or deny
11 the petition.

12 17. If and when Respondent's license is reinstated, she shall pay to the Board
13 costs associated with its investigation and enforcement pursuant to Business and Professions
14 Code Section 125.3 in the amount of \$1,000.00. Respondent shall be permitted to pay these costs
15 in a payment plan approved by the Board. Nothing in this provision shall be construed to
16 prohibit the Board from reducing the amount of cost recovery upon reinstatement of the
17 license.

18 18. Should Respondent ever apply or reapply for a new license or certification,
19 or petition for reinstatement of a license, by any other health care licensing agency in the State of
20 California, all of the charges and allegations contained in Accusation, No. 2008-185 shall be
21 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
22 Issues or any other proceeding seeking to deny or restrict licensure.

23 19. Respondent shall not apply for licensure or petition for reinstatement for
24 two (2) years from the effective date of the Board of Registered Nursing's Decision and Order.

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ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 07/03/08.


Laura Lee Ollis
Respondent


ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

DATED: 7-29-08

EDMUND G. BROWN JR., Attorney General
of the State of California

LINDA K. SCHNEIDER
Supervising Deputy Attorney General


RITA M. LANE
Deputy Attorney General

Attorneys for Complainant

Exhibit A
Accusation No. 2008-185

EDMUND G. BROWN JR., Attorney General
of the State of California

JAMES M. LEDAKIS

Supervising Deputy Attorney General

RITA M. LANE, State Bar No. 171352

Deputy Attorney General

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Attorneys for Complainant

**BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. *2008-185*

**LAURA LEE OLLIS, aka
LAURA OLLIS, aka
LEE SUSAN KNIGHT, aka
LORA LEE OLLIS**

A C C U S A T I O N

14581 May Lane
Moreno Valley, California 92553

Registered Nurse License No. 436840

Respondent.

Ruth Ann Terry, M.P.H., R.N. ("Complainant") alleges:

PARTIES

1. Complainant brings this Accusation solely in her official capacity as the Executive Officer of the Board of Registered Nursing ("Board"), Department of Consumer Affairs.

2. On or about March 31, 1989, the Board issued Registered Nurse License Number 436840 ("license") to Laura Lee Ollis, also known as Lee Susan Knight and Lora Lee Ollis ("Respondent"). The license expired on October 31, 2006.

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4. Section 482 of the Code states:

Each board under the provisions of this code shall develop criteria to evaluate the rehabilitation of a person when:

5. Section 490 of the Code states:

6. Section 493 of the Code states:

As used in this section, ‘license’ includes ‘certificate,’ ‘permit,’ ‘authority,’ and ‘registration.’

2

1 7. Section 2750 of the Code provides, in pertinent part, that the Board may
2 discipline any licensee, including a licensee holding a temporary or an inactive license, for any
3 reason provided in Article 3 (commencing with Code section 2750) of the Nursing Practice Act.

4 8. Section 2761 of the Code states, in pertinent part:

5 The board may take disciplinary action against a certified or licensed nurse
6 or deny an application for a certificate or license for any of the following:

7 (a) Unprofessional conduct, . . .

8

9 (f) Conviction of a felony or of any offense substantially related to the
10 qualifications, functions, and duties of a registered nurse, in which event the
11 record of the conviction shall be conclusive evidence thereof.

12 9. Section 2762 of the Code states, in pertinent part:

13 In addition to other acts constituting unprofessional conduct within the
14 meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct
15 for a person licensed under this chapter to do any of the following:

16 (a) Obtain or possess in violation of law, or prescribe, or except as
17 directed by a licensed physician and surgeon, dentist, or podiatrist administer to
18 himself or herself, or furnish or administer to another, any controlled substance as
19 defined in Division 10 (commencing with Section 11000) of the Health and Safety
20 Code or any dangerous drug or dangerous device as defined in Section 4022.

21 10. Section 2764 of the Code provides, in pertinent part, that the expiration of
22 a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding
23 against the licensee or to render a decision imposing discipline on the license. Under section
24 2811(b) of the Code, the Board may renew an expired license at any time within eight years after
25 the expiration.

26 11. Section 4060 of the Code states, in pertinent part:

27 No person shall possess any controlled substance, except that furnished to
28 a person upon the prescription of a physician, dentist, podiatrist, optometrist, or
veterinarian, or furnished pursuant to a drug order issued by a certified nurse-
midwife . . . , a nurse practitioner . . . , or a physician assistant, or a pharmacist. . .

12 12. Health and Safety Code Section 11173, subdivision (a), provides that no
13 person shall obtain or attempt to obtain controlled substances, or procure or attempt to procure

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1 the administration of or prescription for controlled substances, (1) by fraud, deceit,
2 misrepresentation, or subterfuge; or (2) by the concealment of a material fact.

3 COST RECOVERY

4 13. Section 125.3 of the Code provides, in pertinent part, that the Board may
5 request the administrative law judge to direct a licentiate found to have committed a violation or
6 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
7 and enforcement of the case.

8 14. DRUG

9 "Morphine (MS)" is a Schedule II controlled substance as designated by Health
10 and Safety Code section 11055, subdivision (b)(1)(M).

11 FIRST CAUSE FOR DISCIPLINE

12 (June 14, 2006 Criminal Conviction - Embezzlement on May 4, 2006)

13 15. Respondent is subject to disciplinary action under Code sections 490, 493
14 and 2761(f) based on her conviction of a crime substantially related to the qualifications,
15 functions, and duties of a registered nurse. The circumstances are as follows.

16 16. On or about June 14, 2006 in the matter of *People of the State of*
17 *California v. Laura Ollis*, Riverside Superior Court Case No. RIF130406, Respondent was
18 convicted by her plea of guilty of violating Penal Code section 503 (Embezzlement), a
19 misdemeanor.

20 17. The circumstances of the crime are that on or about May 4, 2006, while
21 Respondent was employed as a registered nurse at Riverside County Regional Medical Center,
22 she unlawfully took Morphine from Riverside County Regional Medical Center. Respondent had
23 been in the process of wasting a dose of morphine with another nurse, when the other nurse
24 turned away. Respondent then concealed the morphine syringe on her person. Later that day,
25 Respondent was discovered in possession of the syringe with 5 ml of morphine in it.

26 18. On June 14, 2006, Respondent was placed on 2 years summary probation,
27 and sentenced to serve 90 days in custody with the county Sheriff to be served on consecutive
28 weekends; pay restitution and fines. On September 8, 2006, Respondent appeared in court and

1 admitted being in violation of her probation term requiring her to serve weekend custody with the
2 Sheriff's Department. Respondent's probation was reinstated on the same terms and conditions,
3 and she was given an additional 30 days of custody time.

4 **SECOND CAUSE FOR DISCIPLINE**

5 **(Obtained and Possessed a Controlled Substance)**

6 19. Respondent is subject to disciplinary action under Code section 2762,
7 subdivision (a), on the grounds of unprofessional conduct, in that on May 4, 2006, while on duty
8 as a registered nurse at the Riverside County Regional Medical Center, Respondent committed
9 the following acts:

10 a. Respondent obtained Morphine, a Schedule II controlled substance, by
11 fraud, deceit, misrepresentation, or subterfuge by obtaining the drugs from hospital supplies, in
12 violation of Health and Safety Code section 11173, subdivision (a) and as more specifically set
13 forth in paragraph 17 above and incorporated herein.

14 b. Respondent possessed Morphine, a Schedule II controlled substance,
15 without a valid prescription, in violation of Code section 4060 and as more specifically set forth
16 in paragraph 17 above and incorporated herein.

17 **THIRD CAUSE FOR DISCIPLINE**

18 **(Unprofessional Conduct - Arrest for Possession of a Controlled Substance)**

19 20. Respondent is subject to disciplinary action under Code section 2761,
20 subdivision (a), on the grounds of unprofessional conduct, in that on May 4, 2006, Respondent
21 was arrested for possession of a controlled substance while on duty as a registered nurse at the
22 Riverside County Regional Medical Center. The circumstances are as follows:

23 21. On or about May 4, 2006, Respondent was arrested for being in possession
24 of Morphine, a controlled substance, that she had unlawfully taken earlier that day from her
25 employer at Riverside County Regional Medical Center. On or about June 14, 2006 in the matter
26 of *People of the State of California v. Laura Ollis*, Riverside Superior Court Case No.
27 RIF130406, Respondent pled guilty to violating Health and Safety Code section 11350(a)
28 (Possession of a Controlled Substance), a felony. Judgment on the plea to Health and Safety

1 Code section 11350(a) was deferred pursuant to Penal Code section 1000 and diversion was
2 granted for 18 months.

3 22. As part of the deferment, Respondent was ordered to enroll and comply
4 with the diversion program. Respondent was to report to court on August 25, 2006 to show
5 proof that she had enrolled in the High Road Diversion program. On August 25, 2006,
6 Respondent failed to appear in court and her diversion and probation were ordered revoked.
7 Criminal proceedings were resumed and a bench warrant was issued.

8 23. On September 8, 2006, Respondent appeared in court and her probation
9 was reinstated. Respondent was ordered to enroll in a substance abuse program and to show
10 proof of enrollment.

11 24. On October 20, 2006, Respondent's probation was vacated and the
12 deferred judgment pursuant to Penal Code section 1000 was reinstated. As a result, the court
13 dismissed the conviction for possession of a controlled substance against Respondent.

14 **PRAYER**

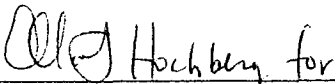
15 WHEREFORE, Complainant requests that a hearing be held on the matters herein
16 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

17 1. Revoking or suspending Registered Nurse License Number 436840 issued
18 to Laura Lee Ollis, also known as Lee Susan Knight and Lora Lee Ollis;

19 2. Ordering Laura Lee Ollis, also known as Lee Susan Knight and Lora Lee
20 Ollis to pay the Board the reasonable costs of the investigation and enforcement of this case
21 pursuant to Code section 125.3; and,

22 3. Taking such other and further action as deemed necessary and proper.

23 DATED: 12/13/07

24 
25 RUTH ANN TERRY, M.P.H., R.N.
26 Executive Officer
27 Board of Registered Nursing
28 Department of Consumer Affairs
State of California
Complainant